## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case	

## This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD(SN) Ashton et al. v. The Kingdom of Saudi Arabia, 17-cv-2003 (GBD)(SN)

## MOTION TO SUBSTITUTE PARTIES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15(d)

Pursuant to Federal Rules of Civil Procedure 15(d), *Bauer* Plaintiffs herein move the Court to allow substitution of the parties as identified on Exhibit A in the above referenced actions. Each individual being substituted into the case is the Personal Representative of a deceased family member of an individual killed as a result of the terrorist attacks on September 11, 2001 (a "9/11 decedent") or substituting the Personal Representative for a deceased family member of a 9/11 decedent.

Exhibit A identifies the individuals to be substituted in the pleading, including the capacity in which they seek to be substituted, state of residency of at the time the complaint was filed, the 9/11 decedent to which the deceased family member is related to, and the existing pleading that refers to the plaintiff.

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court's ECF system by to ease the burden on the Clerk of the Court's Office due to the size of this MDL.

Dated: September 2, 2022

/s/ Dorothea M. Capone, Esq.
Dorothea M. Capone
Baumeister & Samuels, P.C.
140 Broadway, 46<sup>th</sup> Floor
New York, NY 10005
Telephone (212) 363-1200

Email: tcapone@baumeisterlaw.com